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May 19, 2025

Via Email

Judge Analisa Torres
United States District Judge for the Southern District of New York
500 Pearl Street
New York, NY 10007

RE: Willton NC NY, LLC v. MH I Investment LLC, et al. U.S. District Court for the Southern District of New York Case No. 1:24-cv-05526-AT—Pre-Motion Letter

Dear Judge Torres,

Plaintiff Willton NC NY, LLC hereby submits this letter in connection with the Court's individual practice rules and the Civil Case Management Order entered in this case (ECF Doc. 44).

Consistent with the Court's individual practice rules, we write to inform the Court that Plaintiff intends to move for summary judgment on Counts 4 and 5 of the Amended Complaint. While fact discovery was scheduled to be completed as to those counts by May 5, 2025, it has not yet been completed. The parties continue to work diligently toward completion and will keep the Court apprised of their efforts.

The Court has scheduled a Case Management Conference for May 27, 2025. In light of Plaintiff's intention to move for summary judgment and ongoing discovery, Plaintiff hereby requests that the conference be adjourned. No previous adjournment request has been made and Defendants consent to the request. The parties previously engaged in a lengthy settlement conference with Magistrate Judge Willis; they do not believe that a further magistrate referral for settlement purposes would be productive at this time.

Most sincerely,


s/s Alexander Talel
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The case management conference scheduled for May 27, 2025, is ADJOURNED *sine die*.

SO ORDERED.

Dated: May 20, 2025
New York, New York



ANALISA TORRES
United States District Judge